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The deadline is extended to **March 27, 2025**. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 15.

March 13, 2025

SO ORDERED.

Via ECF

Hon. Arun Subramanian
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

A handwritten signature in black ink, appearing to read "Arun Subramanian".

Arun Subramanian, U.S.D.J.
Date: March 13, 2025

Re: *Paul Martinka v. The Kohas Agency, Inc.*
Case 1:24-cv-09782-AS

Dear Judge Subramanian:

This firm represents plaintiff Paul Martinka ("*Plaintiff*") in the above-referenced matter and writes to respectfully request a brief extension of the deadline for Plaintiff to file a default judgment motion against defendant The Kohas Agency, Inc. ("*Defendant*"), pursuant to Federal Rule of Civil Procedure 55(b)(2), for an additional thirty (30) days, to April 11, 2025.

The reason for the request is that Plaintiff's counsel's general procedure is to attempt to make any and all efforts to contact a defaulting defendant, or any counsel that we may be able to identify, in an effort to resolve the matter with the defaulted defendant prior to seeking a default judgment. Or, if contact is made but resolution is not possible, to proceed with the action through litigation for a final determination on the merits of the claim. In that regard, Plaintiff is currently attempting to contact the Defendant, in the hopes of resolving this matter and in an effort to avoid the waste of judicial resources, which would result from Defendant filing an appearance only after a motion for default judgment had been filed.

The original filing deadline is March 13, 2025 [Dkt. No. 13] and no previous requests have been made or granted/denied. Defendant is in default and therefore neither opposes nor consents to this request. The undersigned acknowledges that this request is untimely under Rule 3.E. of the Court's Individual Practices and apologizes for the tardy filing. Plaintiff respectfully requests this extension at a time when it can cause no harm or prejudice to any party or disruption to the Court's docket and will have no effect on any other existing deadlines.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert, Esq.